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10 *Attorneys for Petitioner*
11 *Tokyo Broadcasting System Television, Inc.*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 IN RE: DMCA § 512(h) SUBPOENA
16 TO VEESP, LLC

17 Case No.

18 **TOKYO BROADCASTING**
19 **SYSTEM TELEVISION, INC.'S**
20 **REQUEST TO THE CLERK FOR**
21 **THE ISSUANCE OF A SUBPOENA**
22 **TO VEESP, LLC PURSUANT TO 17**
23 **U.S.C. § 512(h) TO IDENTIFY**
24 **ALLEGED INFRINGER**

25 Tokyo Broadcasting System Television, Inc. ("TBS"), by and through its
26 undersigned counsel of record, hereby requests that the Clerk of this Court issue a
27 subpoena to Veesp, LLC ("LLC") to identify an alleged infringer or infringers, pursuant
28 to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the
"Subpoena"). A copy of the proposed Subpoena is attached as Exhibit 2 to the
Declaration of Nancy E. Wolff ("Wolff Decl.").

The requested Subpoena relates to infringing materials that TBS discovered on

FILED

APR 22 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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CV-21 80097-MISC.

1 the website <jshow.tv>, which TBS is informed and believes is hosted by Veesp. The
2 infringing materials include unauthorized copies of full episodes of television programs,
3 which are owned solely and exclusively by TBS.

4 TBS has satisfied the requirements for issuance of a subpoena pursuant to 17
5 U.S.C. § 512(h), namely:

- 6 1. TBS has submitted a copy of the notification required by 17 U.S.C. §
7 512(c)(3)(A). *See* Wolff Decl. ¶ 3, Ex. 1.
- 8 2. TBS has submitted the proposed Subpoena concurrently herewith. *See*
9 Wolff Decl. ¶ 5, Ex. 2.
- 10 3. TBS has submitted a sworn declaration confirming the purpose for which
11 the Subpoena is sought is to obtain the identity of the alleged infringer or
12 infringers, and that such information will only be used for the purpose of
13 protecting rights under Title 17 of the United States Code. *See* Wolff Decl.
14 ¶ 4.

15 Because TBS has complied with the statutory requirements, TBS respectfully
16 requests that the Clerk expeditiously issue and sign the proposed Subpoena pursuant to
17 17 U.S.C. § 512(h)(4) and return it to the undersigned counsel for service on Veesp.

18
19 DATED: April 22, 2021

COWAN, DEBAETS, ABRAHAMS
& SHEPPARD LLP

21 By: 
22 NANCY E. WOLFF

23 *Attorneys for Petitioner*
24 *Tokyo Broadcasting*
25 *System Television, Inc.*